
INSPECTION PROCEDURE 89060

DEPARTMENT OF ENERGY OBSERVATIONAL SITE VISITS

Effective Date: 12/30/2022

PROGRAM APPLICABILITY: IMC 2602

89060-01 PROCEDURE OBJECTIVES

01.01 Verify that the Department of Energy, Office of Legacy Management (DOE/LM), complies with the U.S. Nuclear Regulatory Commission (NRC) general license requirements provided in Title 10 to the *Code of Federal Regulations* (10 CFR) 40.27, "General License for Care and Long-term Custody of Residual Radioactive Material Disposal Sites" and §40.28, "General License for Care and Long-term Custody of Uranium and Thorium Byproduct Materials Disposal Sites" related to management of Title I and Title II uranium and thorium mill tailings disposal sites.

01.02 Verify that DOE/LM effectively manages these disposal sites in a manner that will protect public health, safety, and the environment.

89060-02 SITE OBSERVATION REQUIREMENTS

The DOE/LM is responsible for the long-term care and maintenance of sites that have been transferred to DOE/LM pursuant to Title I or Title II of the Uranium Mill Tailings Radiation Control Act of 1978 (UMTRCA). These sites are generally licensed pursuant to 10 CFR 40.27 (Title I) or §40.28 (Title II). Each year, DOE/LM or its contactor conducts inspections at all sites under their management. NRC staff conducts observational site visits at each site in conjunction with DOE/LM inspections or other onsite activities at an interval not to exceed 10 years after the initial inspection. The initial inspection is conducted within two years of site transition to DOE/LM.

02.01 Observation of Site Activities (RM-01).

Verify that DOE/LM and its contractor are implementing the long-term surveillance plan (LTSP) in accordance with the requirements of 10 CFR 40.27 and 10 CFR 40.28.

02.02 Public Dose, Effluent Release and Environmental Monitoring (RM-02).

Verify that DOE/LM posted the appropriate boundary notifications to the public, the postings are in good condition, and the postings are appropriately placed. Verify that environmental monitoring activities are conducted in accordance with the LTSP or other NRC-accepted groundwater monitoring or corrective action programs.

02.03 Follow-up of NRC-identified Issues.

Evaluate any previously identified NRC issues, follow-up items, or items not included or identified during DOE/LM's inspections.

89060-03 INSPECTION GUIDANCE

The purpose of the observational site visits is to ensure that DOE/LM is managing and maintaining the sites in accordance with the general license requirements of 10 CFR 40.27 and §40.28 and commitments provided in the site-specific LTSP or any other NRC-accepted document like a groundwater monitoring plan or other groundwater compliance action plan. The NRC inspection staff will conduct the site observations using a risk-informed, performance-based approach.

Specific details associated with each type of site observation is captured in the modality appendix and associated checklists. In general, it is recommended that the inspector focus on the following risk modules for conduct of the site observation.

03.01 Observation of Site Activities (RM-01).

Review the licensing basis documents such as the LTSP and any stand-alone groundwater or corrective action program. Walkdown the site with DOE/LM or contractor personnel and make note of key elements related to the ongoing work, maintenance, surveillance; and future work planned at the site. Discuss the licensing basis documents with DOE/LM and contractor staff to identify any issues or potential changes to the licensing basis documents. Observe the site features or activities that are most risk significant.

Using a risk-informed, performance-based approach, verify that DOE/LM and its contractors are performing work in accordance with the provisions of the LTSP including:

- Notifying the NRC of any changes to the LTSP
- Granting permanent right-of-entry to NRC representatives for the purpose of periodic site observations
- Notifying the NRC prior to undertaking any significant construction, actions, or repairs related to the site, even if the action is required by a State or another Federal agency
- Touring the site with the DOE/LM representatives and their contractors to assess site conditions and identify issues that require attention or issues that may require attention in the future; discuss the issues and concerns identified with the DOE/LM representative

03.02 Public Dose, Effluent Release and Environmental Protection (RM-02).

If sampling will be conducted by DOE/LM and its contractors during the site observation visit, discuss with NRC program management prior to the trip, the need to request DOE/LM collect a composite sample volume that is large enough that it can be split between DOE/LM and NRC, or to observe the sampling event. Verify that the samples

are collected in an acceptable valid manner in accordance with DOE/LM-approved procedures and care is taken to avoid cross contamination.

Verify that DOE/LM and its contractor perform:

- Groundwater and surface water sampling as described in the instructions provided in the LTSP, or any NRC-accepted sampling plan for the site
- Verify that the sampling results are compared to the acceptance criteria, if any, and the results are reported to the NRC as required. In consultation with the NRC's program office when deemed necessary, collect independent or split samples for analysis and comparison to DOE/LM's results
- Ensure that DOE/LM and its contractor are implementing monitoring, maintenance, security, and emergency measures as necessary to protect public health and safety and prevent unauthorized access
- Verify the placement of environmental dosimetry along the fence line or any other location as identified in the applicable documents
- Make note of and verify condition/operability of any air sampling equipment onsite if applicable
- Conduct independent of side-by-side radiological surveys onsite as necessary
- Verify the postings such as those notifying public or site workers of the presence of radioactive material are in good condition
- Verify the condition of the sampling and monitoring wells as appropriate
- Verify the site monument(s) are in good condition
- Verify the condition of the fence surrounding the site and make note of areas where the fence is damaged, or debris has built up along the fence line
- Identify and discuss signs of weather or other natural systems impact on site conditions as applicable (such as signs of animal intrusion or rilling around mill tailings piles)

03.03 Follow-up of NRC-Identified Issues.

Review previously identified focus areas (e.g., identified issues, follow-up items) based on site-specific circumstances.

89060-04 RESOURCE ESTIMATE

An inspection performed using this Inspection Procedure is estimated to require 8-16 hours of NRC inspection staff resources. This estimate is only for the direct inspection effort and does not include inspection-related travel, preparation for, and documentation of the inspection.

89060-05 PROCEDURE COMPLETION

This Inspection Procedure (IP) is complete when the inspection staff observe the activities, interview site staff, and review records as needed to satisfy the objectives of this IP. This IP should be completed as needed as described in the annual master inspection plan (MIP).

89060-06 REFERENCES

IMC 2602, "Decommissioning Fuel Cycle, Uranium Recovery, and Materials Inspection Program"

NRC Memorandum, "Division of Waste Management and Environmental Protection Actions to Address Recommendation 2 of the Office of the Inspector General Audit of the Uranium Recovery Decommissioning Program" (ML12213A418, non-publicly available)

NRC Memorandum, "Inspection Frequency for U.S. Department of Energy Observational Site Visits" (ML19137A005, non-publicly available)

END

APPENDICES

- Appendix A: DOE Observational Site Visit Overview and inspection checklist – UMTRCA Sites
- Appendix B: Sample Cover Memorandum to Docket File
- Appendix C: Sample Trip Report Template

ATTACHMENTS

- Attachment 1: Revision History for IP 89060

Appendix A: Department of Energy Observational Site Visit Program Overview – UMTRCA Sites

The UMTRCA program includes Title I and II sites in NRC Regions I and IV. The number of sites will increase as ongoing site reclamations are completed at existing privately owned sites licensed by the NRC or Agreement States. All but one of the UMTRCA Title I disposal sites are currently maintained under the general license requirements provided in 10 CFR 40.27. A portion of the cell at the Grand Junction, Colorado, Disposal Site remains open and is operated by DOE/LM to receive additional low-level radioactive waste materials from various sources. For this site, the annual LTSP inspection requirements apply only to the closed and completed portion of the Grand Junction disposal cell and the surrounding site. The remainder of the sites to be transferred to the long-term custodian (DOE/LM) are Title II sites that will be managed under 10 CFR 40.28.

A.1 Scheduling of Observational Site Visits

In accordance with the guidance provided in two non-publicly available NRC Memorandums dated 2012 and 2019 (Agencywide Documents Access and Management System [ADAMS] accession numbers ML12213A418 and ML19137A005), the Regions are required to conduct observational site visits at each site at least once every 10 years using a graded approach. The NRC recognizes that in some cases, observational site visits may need to occur more frequently at sites where performance issues are identified, and that the frequency of the visits would likely change over time as issues are identified and resolved.

The DOE/LM or its contractor conducts two types of oversight activities at UMTRCA sites under DOE/LM's long-term care and maintenance program. DOE/LM identifies these activities as either "sampling" or "inspections." DOE/LM's current contractor provides NRC staff with an updated inspection/sampling schedule on a monthly basis. The contractor also developed guidance entitled, "Sampling and Analysis Plan for U.S. Department of Energy Office of Legacy Management Sites." In addition, DOE/LM has developed, "Guidance for Implementing Long-Term Surveillance Plans for UMTRCA Title I and Title II Disposal Sites," for use by DOE/LM project managers and inspectors. These guidance documents establish the sampling/inspection program for sites licensed pursuant to 10 CFR 40.27 and §40.28. These DOE/LM documents are available from DOE/LM staff or can be found at <http://www.lm.doe.gov>.

Regions with Title I and II sites within their geographic domain should develop and maintain a MIP or equivalent to manage these observational site visits. For any given year, the planned observational site visits should include a combination of DOE/LM inspections and sampling events.

The DOE/LM maintains a list of sites and planned turnover dates for the Title II sites currently licensed by the NRC and Agreement States. The list is provided in DOE's Legacy Management Site Management Guide (also called the Blue Book). This document is updated annually and is easily located on DOE/LM's web page. The regional staff should review this guide at least once per year, to review the list of sites that will be turning over to DOE/LM and managed under the general license requirements provided in 10 CFR 40.27 and §40.28. The MIP should be updated as needed to schedule and conduct these new site inspections into the future.

On occasion, the associated NRC project manager for a Title I or Title II site may visit a site as part of their regular duties. This site visit may count as an observational site visit, if the project manager verifies compliance with LTSP, general license requirements, other DOE/LM commitments, and provides a memorandum to the docket file documenting the site visit.

A.2 Identification of Sites with Performance Issues

Some sites may experience performance issues. The two most common performance issues involve the tailings cover and groundwater contamination exceeding limits or moving off-site. Factors that should be used to determine the frequency and schedule for the observational site visits include, but are not limited to:

- Evidence of tailings impoundment degradation such as rills, slumping, or rock cover degradation
- Evidence of human or animal intrusion
- Limit exceedances or groundwater contamination migration towards the site boundary
- Airborne radioactivity leaving the site
- Encroaching human habitation
- Ongoing groundwater remediation
- Stakeholder or public interest

Sites that experience any of the above, or other issues not specifically listed above, should be factored into the Regions' decision to schedule and conduct observational site visits.

A.3 Preparation for Observational Site Visit

Prior to conducting the site visit, the NRC inspection staff should obtain and review the following documents from the associated docket file or from DOE/LM's web page:

- Site-specific LTSP
- Most recent annual site inspection report issued by DOE/LM
- Groundwater sampling results issued by DOE/LM or its contractor since the last NRC site visit if groundwater was sampled or is planned to be sampled
- Groundwater sampling procedures if the NRC inspection staff plans to observe DOE or its contractor collecting groundwater samples
- Any recent reports or letters involving site maintenance, onsite follow-up activities, emergency measures, environmental monitoring, or proposed changes to the LTSP
- Most recent NRC observational site visit report, if available

- Draft checklist to be used by DOE/LM representatives, if available before the site visit

The NRC inspection staff will coordinate the site visit with the NRC project manager for that site. This coordination will help ensure that the NRC inspection staff is aware of any policy or technical issues at the site and affords the project manager the opportunity to accompany the NRC inspection staff to the visit or request the NRC inspection staff review certain issues or site activities.

Prior to conducting the visit, using the inspection scheduling process in effect at that time, the NRC inspection staff will obtain an inspection charge code based on the docket number for that site. The site visit will be billable to DOE/LM.

NRC Inspection staffs should be aware that many of these sites are located in remote areas and require driving on gravel or dirt roads and walking down the site can include wading through vegetation and crossing creek beds to access sampling points, it is important to ensure that the NRC inspection staff either ride with DOE/LM to the site or obtain a rental car that will handle rough terrain such as an SUV. The NRC inspection staff should make sure to have water, food, sunscreen, sunglasses, a hat, sturdy shoes (steel-toed boots in most cases), long pants, and insect repellent in addition to a survey meter, notebook, and cell phone. Prepare carefully to prevent getting overheated or dehydrated.. Based on experience, the NRC inspection staff should consider bringing a backpack to carry needed items.

A.4 Conducting the Observational Site Visit

With rare exceptions, the NRC staff will accompany DOE/LM site representatives, or its contractors, during the site visit. However, the NRC may conduct independent site visits without a DOE/LM representative. Depending on site conditions and the purpose of the inspection (annual DOE/LM inspection or groundwater sampling), the observational site visit may last from half a day to more than two days. The DOE/LM staff normally start the site inspection with a briefing of the site-specific safety hazards and provide an overview of the planned inspection. The NRC inspection staff should take notes, including list of attendees, for documentation of the observational site visit.

As a precaution, NRC inspection staffs should carry a radiological survey meter, such as a Ludlum micro-Roentgen survey meter, to measure ambient gamma exposure rates. The purpose of the survey is to ensure that onsite exposure rates are representative of background levels. If the NRC inspection staff identifies any abnormal survey result, the NRC inspection staff should consider collecting environmental samples, such as soil samples, on a case-by-case basis. Abnormal survey results should be discussed with the NRC project manager, DOE/LM site manager and, as appropriate, the contractor's lead representative.

It is recommended that the NRC inspection staff take photographs of pertinent site features such as monuments, tailings impoundments, and any unusual site conditions. The photographs should be obtained and managed in accordance with the NRC's policy provided in Inspection Manual Chapter 0620, "Inspection Documents and Records." The NRC inspection staff should allow the DOE/LM site representative(s) to review all photographs, because any photograph taken at the site may be included in the publicly available NRC docket files.

For site inspections, DOE/LM inspectors should conduct the inspection as documented in the site-specific LTSP and inspection checklist. Items on the checklist may be deferred due to work previously conducted or planned for later in the year. Examples include well inspections due to planned sampling event, invasive species inspection due to recent topical treatment. If NRC identifies deviations from the LTSP, they will discuss these items with the DOE/LM Project Manager. The DOE/LM representatives typically provide copies of the checklist and site maps to the NRC inspection staff prior to the site inspection. While onsite, the NRC inspection staff should observe the following site conditions and compare them to the LTSP requirements:

- Overall condition of gates, fences, and roads
- Posting and marking of site boundaries with warning signs
- Verification of boundary monuments
- Evidence of disturbance or intrusion into the cell or the site boundary (e.g., vehicle, animal tracks, claims markers, grazing, etc.)
- Condition of tailings impoundment. Look for signs of degradation caused by ponding, slumping, settlement, erosion, intrusive vegetation, etc.
- Status of monitoring wells. Are wellheads damaged; secured by DOE/LM lock?
- Condition of diversion channels (if any). Look for signs of erosion, degradation of riprap
- Observable changes in land use around the site

If the inspection staff observes the collection of water samples, the inspection staff should ensure that the samplers are following DOE/LM's approved sampling procedures.

During the observational site visits, the NRC inspection staff should interview DOE/LM site representatives, in part, to determine if DOE/LM plans to:

- Change the LTSP or groundwater monitoring program (DOE/LM is required to notify NRC of any changes per 10 CFR 40.27(c) and 40.28(c))
- Conduct any follow-up inspections; the criteria for follow-up inspections are provided in the LTSP
- Conduct routine or non-routine site maintenance, or additional environmental monitoring in the future

In addition, the NRC inspection staff should interview DOE/LM representatives and review recent records to ensure that DOE/LM has performed the LTSP-required site inspections on an annual frequency. Further, the requirements for DOE/LM personnel performing the annual inspections (number of staff and qualifications of staff) are provided in the site-specific LTSP. Finally, the NRC inspection staff should interview DOE/LM staff to confirm that they are qualified to conduct the inspection or collect groundwater samples.

A.5 Groundwater Sampling

Groundwater monitoring is conducted at Title I/II sites, as provided in the site-specific LTSP or separate groundwater compliance action program document (GCAP). If the site has an active groundwater monitoring program, the NRC inspection staff should review the program and the results from sampling events conducted since the last site visit. The inspection staff should review the DOE/LM's Data Validation Reports in addition to the annual groundwater sampling reports. If any sample result has exceeded the respective action level or limit specified in the LTSP, the inspection staff should ensure that DOE/LM or its contractor has taken the required action specified in the LTSP.

With NRC program office approval, the NRC inspection staff may collect and/or split groundwater samples with DOE/LM or its contractors. The inspection staff should pre-plan for this activity. First, the inspection staff should become familiar with the constituents of concern for the site by reviewing the LTSP and all groundwater sampling reports (note that for UMTRCA sites, the NRC also has responsibility for some non-radioactive constituents such as selenium and molybdenum). The inspection staff should obtain chain of custody forms (NRC Form 303), sample containers, and sampling instructions. The sampling instructions can be industry-accepted standards, NRC Regional procedures, or the NRC's contract laboratory sampling procedures. The inspection staff should contact the NRC's contract laboratory to obtain any special sampling instructions such as water filtering or preservation.

If the inspection staff plans to have the groundwater samples analyzed for chemical (non-radiological) contaminants, the inspection staff should fill out an NRC Form 30 in advance for submittal of the samples to an outside laboratory qualified for these types of samples. With NRC program office approval, the NRC inspection staff may consider submitting blind split and/or spiked samples for DOE/LM contract laboratory analyses. The blind samples can be duplicate split samples collected during water sampling. If the NRC inspection staff decides to submit spiked blind samples for DOE/LM contract laboratory analyses, the inspection staff should discuss the step-by-step process for spiking samples with the NRC's contract laboratory prior to the onsite visit. If the samples are being shipped as excepted packages containing limited quantities of radioactive material, then the NRC inspection staff must comply with U.S. Department of Transportation shipping requirements (49 CFR 107 171 through 180 and 390 through 397). In addition, special shipping requirements apply to shipment of liquid samples.

A.6 Unusual Site Activities

Any site may experience an emergent or unusual site condition that requires additional response by DOE/LM. These unusual site situations may include seismic events, extreme weather events, wildfires, vandalism, or invasion by undesirable plants or animals that threaten the long-term stability of the tailings. The DOE/LM's responses may include non-routine site maintenance, repairs, and/or reconstruction work. If the NRC elects to conduct a non-routine observational site visit in response to any of these events, the NRC inspection staff should prepare accordingly for these unusual situations. The NRC may elect to send technical experts to the site, including geotechnical experts, to support the NRC inspection staff.

If DOE/LM determines that work involving radioactive material may be involved, or if DOE/LM plans to implement a radiation protection program to support a particular work activity, the NRC inspection staff should discuss these new procedure requirements with

the NRC project manager, NRC management, and DOE/LM site representative prior to the observational site visit. The NRC inspection staff should review any work plan or other available documentation prior to the onsite visit.

A.7 Post-Observation Activities

After the site observation has been completed, the NRC inspection staff should debrief with the DOE/LM site manager, associated DOE/LM project representative, NRC project manager, and NRC regional management. Any problems identified during the site visit should be discussed with the DOE/LM site representative prior to leaving the site. Further, the NRC inspection staff should make note of any previously identified NRC finding and provide an update of this topic in the debriefs to NRC regional management and the NRC site trip report document.

If the NRC inspection staff identifies any non-compliances during the site visit, the inspection staff should discuss these issues with NRC management to ensure that they are properly assessed and documented.

If the NRC inspection staff collected split samples, the NRC inspection staff should delay the issuance of the observational site visit trip report until the sample results have been received. The NRC inspection staff should compare the NRC's sample results to DOE/LM's sample results, and all sample results should be compared to the acceptance criteria provided in the site-specific LTSP. The NRC inspection staff should document the results of this review in the trip report. In addition, the NRC inspection staff should add the NRC's sample results to the docket file for this site.

If the NRC's sample results are not statistically similar to DOE/LM's sample results, the NRC inspection staff should discuss these discrepancies with the NRC's contract laboratory manager. Depending on the significance of the discrepancies, the NRC inspection staff, with regional management approval, may accept the discrepancies due to difference in analytical methodology, calibration, conversion factors, etc.. Alternatively, the NRC inspection staff may request that DOE/LM conduct additional sampling, perform duplicate analyses, or use alternate analytical methods. The results of the DOE/LM inspections are required to be submitted to the NRC annually. The inspection staff should review the DOE/LM report for consistency with LTSP requirements. Inconsistencies should be reported to the DOE/LM site representative and the responsible NRC project manager. The NRC inspection staff should conduct this report review before or during the NRC observational site visit. Otherwise, the NRC inspection staff should review this document during the next routine inspection, if issued after the onsite visit.

If significant issues that could adversely impact public health and safety are identified, they should be discussed with DOE/LM and its contractor during the visit and the NRC inspection staff should immediately inform the NRC project manager and regional management. If any items of non-compliance with the LTSP are identified (that are not significant issues that could adversely impact public health and safety), the inspection staff should discuss these non-compliances with the NRC project manager and regional management. The site project manager and the inspection staff will develop a letter to the DOE/LM site project manager outlining the items of non-compliance and request that DOE/LM address them in a timely manner and inform NRC when the non-compliances have been resolved.

A.8 Documentation of Observational Site Visits

The NRC staff will document the results of the observational site visits in an observational site visit report. A template for this report is included in Appendices B and C to this Inspection Procedure. The trip report will be made publicly available.

A.9 Annual Report Review

The DOE/LM's Title I and Title II inspection reports are submitted to NRC once each year, typically in December or January (for the previous year). It is important that NRC staff compare the results of the DOE/LM inspections with the NRC staff observational site visit reports, and that these comparisons are conducted in a timely manner once both documents are available. The NRC project manager, in conjunction with the regional inspection staff, will compare the DOE/LM's site inspection report results with the NRC observational site visit reports within 60 days of the submission of the later of the two documents. If the two documents are not consistent, the matter should be discussed with headquarters and regional management to determine what, if any, additional action is warranted. The results of this review will be documented in a letter from the NRC's project manager to DOE/LM.

Appendix B: Sample Cover Memorandum To Docket File

[add appropriate Regional or NMSS letterhead here]

(Date Approved)

MEMORANDUM TO: DOCKET FILE xxxxxx

THROUGH: *NRC Branch Chief*

FROM: *NRC Inspection staff/observer*

SUBJECT: OBSERVATIONAL SITE VISIT AT THE (*Name of Site*)

The U.S. Nuclear Regulatory Commission, (*Region IV or NMSS Office*), conducted an observational site visit from (*date*) at the U.S. Department of Energy's (*name of site*), near (*location*).

The purpose of the site visit was to (*state whether this was a routine, annual visit or a non-routine visit. Summarize the site visit.*)

(*Add the following sentence as appropriate; otherwise, explain any high-level problems or observations identified during the site visit as detailed in sections XX of this IP.*) No regulatory issues or safety concerns were identified during the site visit.

Docket: xxxx

License: General License Pursuant to 10 CFR 40.27 (*or 40.28*)

Enclosure:

NRC Trip Report

cc w/enclosure:

(*Include applicable list of DOE/State/other contacts for that site; include email addresses*)

[page break]

bcc w/enclosure:

(*Include applicable NRC contacts – NRC Project Manager for site, PM's Branch Chief, PM's Division Director; Inspector. Inspector's Branch Chief, Inspector's Division Director, etc.*)

(*Add the appropriate concurrence block. Add ADAMS Accession Number. The trip report should be publicly available unless there is a compelling reason otherwise for example: if requested by DOE/LM or contains information determined to be proprietary by DOE or its contractor.*)

Appendix C: Sample Trip Report Template

U.S. NUCLEAR REGULATORY COMMISSION
REGION IV *(or name of other NRC office conducting the site visit)*

Docket: *(docket number for this site)*

License: General License Pursuant to 10 CFR 40.27 *(or 10 CFR 40.28)*

Report: *(docket number/sequential report number for the calendar year for this docket number)*

Licensee: U.S. Department of Energy

Facility: *(name of facility)*

Location: *(city and/or county, state)*

Date(s): *(dates of site visit)*

Inspection staff(s): *(names of NRC staff inspectors)*

Accompanied by: *(names of other NRC staff participating in the site visit)*

Approved by: *(name of approving official, usually a branch chief)*

Attachment: Photographs taken at the *(name of site)*

[page break]

NRC Report

1. Background

(Add any background information, such as recent site history, regulatory issues, or changes in program requirements.)

2. Site Status

(Describe the status of the site at the time of the observational site visit.)

3. Site Observations and Findings

(Describe the as-found site conditions; refer to Guidance Section 03 above for the attributes to be observed during the site visit.)

4. Conclusions

(Summarize observations and findings; confirm compliance with LTSP and 10 CFR 40.27 and 40.28; note any non-compliances.)

5. Meeting Summary

(If a meeting is held before, during, or after the site visit, describe the topics that were discussed.)

6. Persons Contacted
(names, titles, and affiliations of individuals contacted)

Attachment to Trip Report: Photographs taken at the *(name of site)*
(Include figure numbers, describe what was photographed, and be sure to discuss subject of photograph and provide figure number within written text of this trip report.)

END

Attachment 1: Revision History for IP 89060

Commitment Tracking Number	Accession Number Issue Date Change Notice	Description of Change	Description of Training Required and Completion Date	Comment Resolution and Closed Feedback Form Accession Number (Pre-Decisional Non-Public Information)
	ML22132A220 12/15/22 CN 22-026	Initial issuance		ML22327A274